

March 8, 2019

VIA ECF

The Honorable LaShann DeArcy Hall
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Elliott v. Donegan et al., 1:18-cv-05680 (LDH) (SJB)

Dear Judge DeArcy Hall:

We represent Plaintiff, Stephen Elliott, in the above-referenced matter and respectfully submit this letter, pursuant to Your Honor's directive at the March 1, 2019 pre-motion conference, to advise the Court of Plaintiff's intention to amend the Complaint and file said amended pleading by the March 22, 2019 deadline set by Your Honor.

Plaintiff believes that the Amended Complaint will address any perceived deficiencies in the pleading and obviate the need for a future motion to dismiss. In that regard, Plaintiff respectfully requests a brief telephone conference on Monday, March 25, 2019, or as soon thereafter as is convenient for the Court, to discuss Plaintiff's pending discovery request to identify the Jane Does, and to permit Plaintiff to make any amendments to such request as necessary to proceed expeditiously in this matter.

**Very truly yours,
NESENOFF & MILTENBERG, LLP**

**By: /s/ Andrew T. Miltenberg
Andrew Miltenberg, Esq.
Stuart Bernstein, Esq.
Nicholas Lewis, Esq.**

CC: All Counsel (Via ECF)